

U.S. Department of Justice

Washington, DC 20530

**Supplemental Statement****Pursuant to the Foreign Agents Registration Act of 1938, as amended**For 6 Month Period Ending August 31, 2020

(Insert date)

**I - REGISTRANT**

1. (a) Name of Registrant (b) Registration Number
- AF INTERNATIONAL, LLC 6639
- (c) Primary Business Address
- 8209 Tomlinson Avenue, Bethesda, MD 20817

## 2. Has there been a change in the information previously furnished in connection with the following?

## (a) If an individual:

- (1) Residence address(es) Yes ☐ No ☐
- (2) Citizenship Yes ☐ No ☐
- (3) Occupation Yes ☐ No ☐

## (b) If an organization:

- (1) Name Yes ☐ No ☒
- (2) Ownership or control Yes ☐ No ☒
- (3) Branch offices Yes ☐ No ☒

## (c) Explain fully all changes, if any, indicated in Items (a) and (b) above.

**IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSES TO ITEMS 3, 4, 5, AND 6.**

3. If the registrant previously filed an Exhibit C<sup>1</sup>, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☐

If yes, has the registrant filed an updated Exhibit C? Yes ☐ No ☐

If no, please file the updated Exhibit C.

<sup>1</sup> The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

---

4. (a) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes ☐ No ☐

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
------	-------------------	-------------	----------	--------------

(b) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

Yes ☐ No ☐

If yes, furnish the following information:

Name	Position	Date Ceased
------	----------	-------------

---

5. (a) Has any person named in Item 4(a) rendered services directly in furtherance of the interests of any foreign principal?

Yes ☐ No ☐

If yes, identify each such person and describe the service rendered.

Name	Foreign Principal(s) Represented	Services
------	----------------------------------	----------

(b) During this 6 month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☐

Name	Residence Address	Citizenship	Position	Date Assumed
------	-------------------	-------------	----------	--------------

(c) Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☐

If yes, furnish the following information:

Name	Position or Connection	Date Terminated
------	------------------------	-----------------

(d) Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period? Yes ☐ No ☐

If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated
------	------------------------	-------------------	-----------------

---

6. Have short form registration statements been previously filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement or submitted with this filing? Yes ☐ No ☐

If no, list names of persons who have not previously filed the required statement or are not submitting a short form with this filing.

**II - FOREIGN PRINCIPAL**

7. Has the registrant's connection with any foreign principal(s) ended during this 6 month reporting period?

Yes ☒No ☐

If yes, furnish the following information:

Foreign Principal

Komala Representation Office in the United States

Date of Termination

6/1/2020

8. Has the registrant added any new foreign principal(s)<sup>2</sup> during this 6 month reporting period?

Yes ☒No ☐

If yes, furnish the following information:

Foreign Principal

Iran Transition Council

US Mission of the Syrian Democratic Council

Date Added

6/1/2020

6/8/2020

9. In addition to those named in Items 7 and 8, if any, list the foreign principal(s) whom the registrant continued to represent during the 6 month reporting period.

None

10. (a) Has the registrant filed Exhibits A and B for the newly added foreign principal(s), if any, listed in Item 8?

Exhibit A<sup>3</sup>Yes ☒No ☐N/A ☐Exhibit B<sup>4</sup>Yes ☒No ☐N/A ☐

If no, please file the required exhibit.

(b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal(s) whom the registrant represented during this 6 month period?

Yes ☐No ☒

If yes, has the registrant filed an amendment to these exhibits?

Yes ☐No ☒

If no, please file the required amendment.

<sup>2</sup> The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

<sup>3</sup> The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

<sup>4</sup> The Exhibit B, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

**III - ACTIVITIES**

11. During this 6 month reporting period, has the registrant engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail all activities and services:

Foreign Principal	Activities/Services
Iran Transition Council	See Attached
US Mission of Syrian Democratic Council	See Attached

12. During this 6 month reporting period, has the registrant, on behalf of any foreign principal, engaged in political activity<sup>5</sup> as defined below? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures, social media, internet postings, or media broadcasts, give details as to dates, places of delivery, names of speakers and subject matter. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.

Set forth below a general description of the registrant's political activities.

See Attached.

Set forth below in the required detail the registrant's political activities.

Foreign Principal	Date	Contact	Method	Purpose
See Attached				

13. In addition to the above described activities, if any, has the registrant engaged in activity or rendered any services on its own behalf which benefits the registrant's foreign principal(s)? Yes ☐ No ☒

If yes, describe fully.

Foreign Principal	Activities/Services

<sup>5</sup> "Political activity," as defined in Section 1(o) of the Act, means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

**IV - FINANCIAL INFORMATION****14. (a) RECEIPTS-MONIES**

During this 6 month reporting period, has the registrant received from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If no, please explain why no monies were received.

Komala Representation in US --Contract ended and was not renewed.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.<sup>6</sup>

Foreign Principal	Date Received	From Whom	Purpose	Amount	Subtotal
Syrian Democratic Council	July 11,	Syrian Democratic Council	RETAINER	\$6000	
	August 2,			\$6000	
	August 30,			\$6000	
Iran Transition Council		Iran Transition Council	Retainer		\$18000
	June 15,				
	July 7,			\$3000	
	August 10,			\$2000	
	September 13			\$2000	
					\$12000
					30000
					<u>Total</u>

**(b) RECEIPTS - FUNDRAISING CAMPAIGN**

During this 6 month reporting period, has the registrant received, as part of a fundraising campaign<sup>7</sup>, any money on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☐ No ☒

If yes, has the registrant previously filed an Exhibit D<sup>8</sup> to its registration? Yes ☐ No ☒

If yes, indicate the date the Exhibit D was filed. Date \_\_\_\_\_

If no, please file the required Exhibit D.

**(c) RECEIPTS-THINGS OF VALUE**

During this 6 month reporting period, has the registrant received any thing of value<sup>9</sup> other than money from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date Received	From Whom	Purpose	Thing of Value
-------------------	---------------	-----------	---------	----------------

6, 7 A registrant is required to file an Exhibit D if he/she collects or receives contributions, loans, moneys, or other things of value for a foreign principal, as part of a fundraising campaign. (See Rule 201(e)).

8 An Exhibit D, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal.

9 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

---

**15. (a) DISBURSEMENTS-MONIES**

During this 6 month reporting period, has the registrant disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement or transmitted monies to any such foreign principal? Yes ☐ No ☒

If no, explain why no disbursements were made.

All amounts received were in compensation for efforts by registrant.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal
-------------------	------	-----------	---------	--------	----------

---

Total

**(b) DISBURSEMENTS-THINGS OF VALUE**

During this 6 month reporting period, has the registrant disposed of anything of value<sup>10</sup> other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement?

Yes ☐No ☒

If yes, furnish the following information:

Foreign Principal	Date	Recipient	Purpose	Thing of Value
-------------------	------	-----------	---------	----------------

**(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS**

During this 6 month reporting period, has the registrant (or any short form registrant) from its own funds and on its own behalf either directly or through any other person, made any contributions of money or other things of value<sup>11</sup> in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☐No ☒

If yes, furnish the following information:

Date	Donor	Political Organization/Candidate	Method	Amount/Thing of Value
------	-------	----------------------------------	--------	-----------------------

---

10, 11 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

**V - INFORMATIONAL MATERIALS**

16. (a) During this 6 month reporting period, has the registrant prepared, disseminated or caused to be disseminated any informational materials?<sup>12</sup> Yes ☒ No ☐

(b) If yes, identify each such foreign principal for which informational materials were disseminated and respond to the remaining items in this section.

Retweet of one tweet by SDC.

17. During this 6 month reporting period, has a budget been established or specified sum of money allocated to finance the registrant's activities in preparing or disseminating informational materials? Yes ☐ No ☒

If yes, identify each such foreign principal, and specify the period of time and the amount.

Foreign Principal	Period of Time	Amount
-------------------	----------------	--------

18. During this 6 month reporting period, has the registrant's activities in preparing, disseminating or causing the dissemination of informational materials included the use of any of the following:

- |   |   |   |  |
|---|---|---|--|
| <input type="checkbox"/> Magazine or newspaper  | <input type="checkbox"/> Advertising campaigns  | <input type="checkbox"/> Press releases       | <input type="checkbox"/> Pamphlets or other publications |
| <input type="checkbox"/> Lectures or speeches   | <input type="checkbox"/> Radio or TV broadcasts | <input type="checkbox"/> Motion picture films | <input type="checkbox"/> Letters or telegrams            |
| <input type="checkbox"/> Email  |   |   |  |
| <input type="checkbox"/> Website URL(s): _____  |   |   |  |
| <input type="checkbox"/> Social media websites URL(s): _____  |   |   |  |
| <input checked="" type="checkbox"/> Other ( <i>specify</i> ) <u>Retweet of one Washington Diplomat tweet concerning SDC. See attached</u> |   |   |  |

19. During this 6 month reporting period, has the registrant prepared, disseminated, or caused to be disseminated informational materials among any of the following groups:

- |   |   |   |
|---|---|---|
| <input type="checkbox"/> Public officials               | <input type="checkbox"/> Newspapers                   | <input type="checkbox"/> Libraries                |
| <input type="checkbox"/> Legislators                    | <input type="checkbox"/> Editors                      | <input type="checkbox"/> Educational institutions |
| <input type="checkbox"/> Government agencies            | <input type="checkbox"/> Civic groups or associations | <input type="checkbox"/> Nationality groups       |
| <input type="checkbox"/> Other ( <i>specify</i> ) _____ |   |   |

20. Indicate the language used in the informational materials:

- ☒ English ☐ Other (*specify*) \_\_\_\_\_

21. Has the registrant filed with the FARA Unit, U.S. Department of Justice a copy of each item of such informational materials prepared, disseminated or caused to be disseminated during this 6 month reporting period? Yes ☒ No ☐

If no, please file the required informational materials.

22. Has the registrant labeled each item of such informational materials with the statement required by Section 4(b) of the Act?

Yes ☒ No ☐

12 The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.



In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

13 This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

## **Iran Transition Council**

### **Semi-Annual report, March 1-September 30, 2020, virtual meetings**

- Nathan Crook, State Department, September 4<sup>th</sup>, Iran issues, US-Iran relations
- Hudson Institute experts, August 11<sup>th</sup>, Iran issues, US-Iran relations

### **Semi-Annual report, March 1-September 30, 2020, calls**

- Nathan Crook, State Department, July 14<sup>th</sup>, Iran issues, US-Iran relations

### **Semi-Annual report, March 1-September 30, 2020, email communications**

- Nathan Crook, State Department, July 10<sup>th</sup>, August 18<sup>th</sup>, August 30<sup>th</sup>, Iran issues, US-Iran relations
- Sara Carter, saraacarter.com, August 25<sup>th</sup>, Iran issues
- Jon Broder, August 25<sup>th</sup>, Iran issues
- Matt Petti, The National Interest, August 21<sup>st</sup>, Iran issues
- Editor's Desk, Townhall, August 12<sup>th</sup>, Iran issues
- Opinion Editor, Newsweek, July 29<sup>th</sup>, Iran issues
- Editorial Page, The Washington Post, July 23<sup>rd</sup>, Iran issues
- Opinion Editor, The National Interest, June 9<sup>th</sup>, Iran issues

**Komala, Semi-Annual report, March 1-September 30, 2020, meetings and calls**

- Joshua Muravchik, March 4, US-Iran relations, Iranian-Kurdish issues
- Eli Lake, Bloomberg News, March 22, US-Iran relations, Iranian-Kurdish issues
- Sara Carter, saraacarter.com, March 25, US-Iran relations, Iranian-Kurdish issues
- Tom Squitieri Talk Media News, March 26, US-Iran relations, Iranian-Kurdish issues
- Colin Winston, AIPAC, April 21, US-Iran relations, Iranian-Kurdish issues
- Hudson Institute experts, April 22, US-Iran relations, Iranian-Kurdish issues
- Dan Pollak, ZOA, April 23, US-Iran relations, Iranian-Kurdish issues
- Benjamin Rogers, AJC, April 23, US-Iran relations, Iranian-Kurdish issues

**Semi-Annual report, March 1-September 30, 2020, calls**

- Nathan Crook, State Department, March 9, US-Iran relations, Iranian-Kurdish issues

**Semi-Annual report, March 1-September 30, 2020, email communications**

- Nathan Crook, State Department, April 7, April 24, US-Iran relations, Iranian-Kurdish issues

## **Syrian Democratic Council**

### **Semi-Annual report, March 1-September 30, 2020, calls**

- Anna Gawel, The Washington Diplomat, August 20<sup>th</sup>, Syria, US-Syria relations
- Josh Keating, Slate Magazine, August 13<sup>th</sup>, Syria, US-Syria relations
- Blaise Misztal, The Hudson Institute, August 13<sup>th</sup>, Syria, US-Syria relations

### **Semi-Annual report, March 1-September 30, 2020, email communications**

- Afreen Akhter, Sen. Chris Van Hollen, September 29, Syria, US-Syria relations
- Mira Resnick, House Foreign Affairs Committee, September 29, Syria, US-Syria relations
- Ryan Abdelnabi, National Security Council, September 1, Syria, US-Syria relations
- Laura Rozen, al-Monitor, August 31<sup>st</sup>, Syria, US-Syria relations
- Matt Petti, The National Interest, August 18<sup>th</sup>, Syria, US-Syria relations
- Ariella Viehe, Department of Defense, August 14, Syria, US-Syria relations
- Dana Stroul, The Washington Institute, August 14, Syria, US-Syria relations
- Kim Dozier, Time, August 13, September 22, Syria, US-Syria relations
- Missy Ryan, the Washington Post, August 10, Syria, US-Syria-relations
- David Schenker, State Department, August 8, Syria, US-Syria relations
- Naz Durakoglu, Sen. Jeanne Shaheen, August 4, Syria, US-Syria relations
- Mark Morehouse, House Armed Services Committee, July 31, Syria, US-Syria relations
- Bill Monahan, Senate Armed Services Committee, July 31, Syria, US-Syria relations
- Robert Kareem, Sen. Mitch McConnell, July 31, Syria, US-Syrian relations
- Tom Goffus Senate Armed Services Committee, July 31, Syria, US-Syria relations
- Michael Noblet, Senate Armed Services Committee, July 31, Syria, US-Syria relations
- Chris Socha, Senate Foreign Relations Committee, July 31, Syria, US-Syria relations
- Christopher Barr, Senate Foreign Relations Committee, July 31, Syria, US-Syria relations
- Sarah Arkin, Senate Foreign Relations Committee, July 31, Syria, US-Syria relations

### **Semi-Annual report, March 1-September 30, 2020, social media posts**

- Retweet, *Washington Diplomat*, "Sinam Mohamad Pushes US Not to Abandon Her Fellow Kurds," September 25